

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of
AMENDMENT OF PART 97 OF THE
COMMISSION'S RULES GOVERNING
AMATEUR RADIO SERVICE TO
IMPLEMENT CHANGES TO ARTICLE
OF THE INTERNATIONAL RADIO -
REGULATIONS ADOPTED AT THE 2003
WORLD RADIOCOMMUNICATION
CONFERENCE, TO ENHANCE THE
AMATEUR RADIO SERVICE AND TO FULFILL
THE COMMISSION'S OBJECTIVE OF
STREAMLINING THE AMATEUR RADIO
SERVICE AS SET FORTH IN DOCKET **98-143**.

RM-10868

I, Christopher Robison, residing at 88 W Market St, Tiffin, OH 44883, as an individual and as a holder of an amateur station license KC8QOM wish to make my comments to this rule-making proposal that is currently before the Federal Communications Commission for consideration.

After having reviewed the copy of the original document filed with the FCC and considering the full content of the proposal I wish to voice my comments to this proposal.

- 1) While this proposal is very straight and too the point, it contains some very disturbing ideas. The first one that stands out and is of a most serious nature is the idea of assigning specific distinguishable call signs to technician class operators that have access to HF frequencies without having past a morse code testing requirement. This is in effect placing a scarlet letter on those individuals and in my opinion would make the potential for negative attitudes towards those individuals by the "old timers" in the amateur service that much more likely.
- 2) This proposal is counterproductive to the betterment of amateur radio in that it is suggesting that the morse code testing be retained when as a result of WRC-03 the remainder of the world has acknowledged that morse code is no longer required for safe and efficient qualification of operators on the HF bands.
- 3) This proposal continues to preserve the mistaken idea that morse code is something other than just a mode of operation.

In conclusion, I urge the FCC to reject this proposal.

Christopher Robison, KC8QOM
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